



Missouri Department of Higher Education and Workforce Development

**FREQUENTLY ASKED QUESTIONS (FAQs) ABOUT...**

**OWD Issuance 23-2017: Incumbent Worker Training Policy**

April 27, 2018

*Last updated: March 2021.*

**Q: Do the training providers used for the Incumbent Worker Training program have to be on the state's Eligible Training Provider List?**

**A:** No. According 20 CFR 680.530(a) "Providers of on-the-job training, customized training, incumbent worker training, internships, paid or unpaid work experience, transitional jobs are not subject to the requirements applicable to entities listed on the eligible training provider list, and are not included on the State list of eligible training providers and programs."

**Q: Can an employer use the Incumbent Worker Training program to train part-time workers who would transition to full-time work as a result of the training?**

**A:** Yes. Individuals working part-time are not excluded from being considered a trainee. Since the incumbent worker training will lead to both a raise and advancement to full-time status then that would qualify them as an eligible trainee. This will also open up the opportunity for other people to be hired in place of the part-time worker if that position still exists within the company or organization.

**Q: What type of business entity can we establish an IWT agreement with? Private, private-non-profit, etc.?**

**A:** Per [TEGL 19-16](#), "generally, IWT should be provided to private sector employers; however, there may be instances where nonprofit and local government entities may be the recipients of IWT funds." As a reminder, the business has to meet the definition of a business entity per the IWT program agreement as outlined in RSMo Section 285.525; this can include public or private, for profit or non-profit, and government entities.

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**Q: What changed with the most recent update to Attachment 1 (IWT packet)?**

**A:** The first page of the attachment was updated to be a fillable document that must be completed prior to submitting the IWT packet. The completed packet must be submitted to the IWT coordinator prior to the start of any IWT project. Central Office staff need time to set up MoJobs for each IWT project.

**Q: What waiver request was approved for the Incumbent Worker Training Program?**

**A:** The State requested a waiver of WIOA 134(d)(4) and 20 CFR 680.800(a) to allow local areas to reserve more than 20 percent of Adult and Dislocated Worker funds for incumbent worker training (IWT) to assist in its response to the impacts of the pandemic. The US Department of Labor-Employment and Training Administration approved this request and is in effect through June 30, 2022. It permits local areas to increase the allowable threshold available for IWT from 20 to 50 percent.

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*Last updated: February 2020.*

**Q: When do Local Boards pay/reimburse for Incumbent Worker trainings?**

**A:** According to the IWT [general assurances](#) (6(c)), the Employer agrees to provide a verifiable wage increase to all participants who complete the training program.  
**Payment for IWT will be withheld until the wage increase has been verified.** Documentation of this wage increase is to be submitted within 60 days of training completion.

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*Last updated: October 2019.*

**Q: How do staff enter the employer contribution into the Financial Reporting System?**

**A:** Local Workforce Development Board's must report the cumulative total for employer contributions associated with Incumbent Worker Training. The cumulative total is to be entered monthly on the Contract Progress Report (CPR). You will find the entry box under the 'cumulative cash drawn' entry box on the CPR.

Additionally, these resources must be reported quarterly as non-federal leveraged resources.

Please direct all questions or comments regarding the Issuance or this FAQ document to [dwdpolicy@dhewd.mo.gov](mailto:dwdpolicy@dhewd.mo.gov). All active Issuances are available at [jobs.mo.gov/dwdissuances](https://jobs.mo.gov/dwdissuances). Expired/rescinded Issuances are available on request.

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